

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LAWMAN ARMOR CORPORATION,	:	
	:	
Plaintiff,	:	Case No. 2:02-CV-04595-RK
	:	
v.	:	Judge Robert Kelly
	:	
WINNER INTERNATIONAL, LLC,	:	
	:	
Defendant.	:	
	:	

DECLARATION OF JOHN F. HORNBOSTEL JR.

Being duly sworn, I, John F. Hornbostel Jr., hereby state as follows:

1. I am Vice President, General Counsel and Secretary of Winner International, Inc., a Florida corporation with its headquarters at 32 West State Street, Sharon, Pennsylvania 16146. I am a member in good standing of the Bars of New York, Pennsylvania, and Ohio (pending).

2. I am familiar with the business entities and personal residences owned by James E. Winner Jr. and his family. Neither James E. Winner Jr. nor Karen Winner Hale owns a personal residence within the territory of the United States District Court for the Eastern District of Pennsylvania, and neither has a regular and established place of business within that territory.

3. I was Vice President, General Counsel and Secretary of Winner International, LLC, the named defendant in the captioned action. Winner International, LLC was merged into a wholly owned subsidiary of Winner International, Inc. under a plan of merger agreement entered into on May 22, 2002. Winner International, LLC did not survive the merger and shall expire after the annual Delaware LLC tax is due.

4. By the merger, Winner International, Inc. acquired the assets and assumed the liabilities of Winner International, LLC. Winner International, Inc. continues to operate the business formerly conducted by Winner International, LLC.

5. I have reviewed the motion by Lawman Armor Corporation, plaintiff in the captioned action, to amend its complaint to add new defendants, namely an entity identified as "Winner Holdings Company," James E. Winner Jr., and Karen Winner Hale.

6. Paragraph 18 of the Lawman's proposed second amended complaint alleges: "Winner Holdings Company manages, oversees, and maintains overall administration and operation of Winner International." Paragraph 3 makes a similar allegation. Attached as an exhibit to the proposed second amended complaint is a page from the Web site obtainable at <http://theclub.com/jewinner.html>. This Web page states that James E. Winner Jr. "is Chairman of the Board of Winner Holdings Company which was formed in 1996 to oversee and maintain overall administration and operation of Winner International and other Winner businesses."

7. The company identified as "Winner Holdings Company" in the above-quoted statement on the Web site was Winner Holding Corporation, a Delaware corporation. Winner Holding Corporation merged on September 28, 1998 into Winner Holding LLC, a Delaware limited liability company, with Winner Holding LLC surviving. The principal place of business for both of these entities is 32 West State Street, Sharon, Pennsylvania 16146.

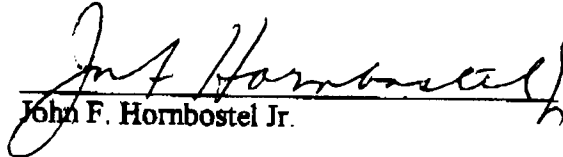
8. I am Vice President, General Counsel and Secretary of Winner Holding LLC and held the same position with Winner Holding Corporation.

9. Although it initially operated as an umbrella company for a number of Winner companies, including Winner International, LLC, Winner Holding LLC has not engaged in

overseeing or maintaining the administration or operation of Winner International (either LLC or Inc.) for at least three years.

10. Winner Holding Corporation and Winner Holding LLC have never manufactured, imported, or sold any vehicle anti-theft device, including those accused of infringement in this action.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this Declaration was executed by me on September 29, 2003, at Sharon, Pennsylvania.


John F. Hornbostel Jr.